# STATE OF ILLINOIS ILLINOIS COMMERCE COMMISSION

Ameren Transmission Company of Illinois	}	
Petition for a Certificate of Public Convenience	}	
and Necessity, pursuant to Section 8-406.1 of	}	
the Illinois Public Utilities Act, and an Order	}	
pursuant to Section 8-503 of the Public Utilities	}	Case No.: 12-0598
Act, to Construct, Operate and Maintain a New	}	
High Voltage Electric Service Line and Related	}	
Facilities in the Counties of Adams, Brown, Cass,	}	
Champaign, Christian, Clark, Coles, Edgar,	}	
Fulton, Macon, Montgomery, Morgan, Moultrie,	}	
Pike, Sangamon, Schuyler, Scott, and Shelby,	}	
Illinois.	}	

### PETITION TO INTERVENE

NOW COMES a group of landowners and residents (hereinafter referred to collectively as "Morgan, Sangamon, and Scott Counties Land Preservation Group") of the geographical area which is the subject of this proceeding, and the geographical area immediately surrounding the geographical area which is the subject of this proceeding, by and through their attorneys, Edward D. McNamara, Jr. and Joseph H. O'Brien of McNamara & Evans, and for their Petition to Intervene in this proceeding, state as follows:

- 1. A Petition was filed by Petitioners herein initiating this proceeding on November 7, 2012.
- 2. The Petition herein seeks approval from the Illinois Commerce Commission ("Commission") for a Certificate of Public Convenience and Necessity, pursuant to Section 8-406.1 of the Illinois Public Utilities Act, and an Order pursuant to Section 8-503 of the Public Utilities Act, to Construct, Operate and Maintain a New High Voltage Electric Service Line and Related Facilities in the Counties of Adams, Brown, Cass, Champaign, Christian, Clark, Coles, Edgar, Fulton, Macon, Montgomery, Morgan, Moultrie, Pike, Sangamon, Schuyler,

Scott, and Shelby, Illinois.

3. The landowners and residents comprising Morgan, Sangamon, and Scott Counties Land

Preservation Group own land and/or reside on or near the projected path of the alternate route

proposed by Petitioners herein and will therefore be substantially affected by any decision

of the Illinois Commerce Commission in this proceeding.

4. Accordingly, Morgan, Sangamon, and Scott Counties Land Preservation Group seeks to

intervene and be treated as an active party to this proceeding in order to formally protect its

collective interests in this matter.

5. Morgan, Sangamon, and Scott Counties Land Preservation Group agrees to accept service

by electronic means as provided for in Section 200.1050 of the Commission's Rules of

Practice. Such service shall be made upon the attorneys of record for Morgan, Sangamon,

and Scott Counties Land Preservation Group.

WHEREFORE, Morgan, Sangamon, and Scott Counties Land Preservation Group respectfully

requests that the Hearing Examiner grant the undersigned Morgan, Sangamon, and Scott Counties

Land Preservation Group leave to be joined as an active party to this proceeding.

Respectfully Requested,

Morgan, Sangamon, and Scott Counties Land Preservation Group,

Jeff & Peggy Bergschneider

John Bergschneider

Joseph & Barbara Bergschneider

Paul & Janie Bergschneider

Robert H. & Marilyn P. Bergschneider Trust

Scott Bergschneider

Thomas & Helen Bergschneider

Jan & Lola Caruthers

Kelly Dodsworth

Curt Willard Dodsworth Living Trust

Lillian Gordley

Scott Gordley

Paula D. Harms

King & Rector Farms

Ted & Julie Mies

Rita B. Walsh

White Oaks Farms LP

By and through their attorneys,

Edward D. McNamara, Jr.

Joseph H. O'Brien

## **VERIFICATION**

STATE OF ILLINOIS	}
	SS
COUNTY OF SANGAMON	}

Edward D. McNamara, Jr., being first duly sworn, deposes and says that he is authorized to execute this Petition to Intervene; that he has read the above and foregoing document, has knowledge of the facts stated therein; and herewith states that the matters set forth therein are true and in substance and in fact.

Edward D. McNamara, Jr.

Subscribed and Sworn to before me this 21st day of December, 2012.

Elward D. M. Vernara St.P.

Notary Public

OF ILLES OF

Edward D. McNamara, Jr.
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### CERTIFICATE OF SERVICE

Edward D. McNamara, Jr., an attorney, hereby certifies that he served copies of the foregoing PETITION TO INTERVENE on the individuals shown on the below Service List, via electronic mail, on December 21, 2012.

Edward D. McNamara, Jr.

## SERVICE LIST

John D. Albers Kelly Armstrong Kyle C. Barry Kimberly W. Bojko Colleen A. Check Eric E. Dearmont Erika Dominick Matthew Dorsett Christopher M. Ellis Edward C. Fitzhenry Christopher W. Flynn Matthew L. Harvey Christopher Kennedy G. Ronald Kesinger Joseph L. Lakshmanan Kathleen E. Ratcliffe Shannon K. Rust Rebecca Segal Rachel Hampton Albert D. Sturtevant Anne M. Zehr Joel W. Kanvik Martha Krohe Adam T. Margolin John M. Myers Kathryn L. Patton Joseph E. Hooker Christopher N. Skev Erin Szalkowski Christopher J. Townsend Angela M. Weis Edward R. Gower Luke A. Hagedorn John T. Long Tim Shrake Richard T. Copeland Jr. Tori Phillips

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